

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

CASCADIA WATER, LLC,

Respondent.

DOCKET UW-240151

WATER CONSUMER ADVOCATES OF WASHINGTON, INTERVENOR

November 20, 2024

Direct Exhibit of Blaine C. Gilles

Cascadia Response to WCAW DR 43

Exh. BCG-16



Rates & Regulatory Affairs

UW-240151

Cascadia Water LLC Proposed General Rate Case

Data Request Response

Date of Response: 9/25/2024

Responder/Witness: Culley Lehman

Request No.: UW-240151 WCAW DR 43

Please produce all documents from a consulting or inhouse Washington state-licensed engineer upon which you rely in contending Cascadia must bring systems into compliance with DOH minimum design standards, for each of the eight projects referenced by Cascadia in its response.

Response:

Cascadia Water LLC objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks documents beyond the scope of Cascadia's possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding. Without waiving the foregoing objections, Cascadia Water LLC responds as follows:

We rely on our engineers to design/engineer projects that use current standards (from the DOH Water System Design Manual, WAC 246-290, and local county code) to ensure that adequate service levels are being provided to customers and that installed improvements will support the long-term operation of the system.

The fact that we must bring systems into compliance with DOH minimum design standards is a regulatory/legal reality.